

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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YVES SAINT LAURENT PARFUMS S.A. and :
YSL BEAUTÉ INC., :

Plaintiffs, :

- against - :

COSTCO WHOLESALE CORPORATION, :
QUALITY KING DISTRIBUTORS, INC. and :
J & H COSMETICS LTD., :

Defendants. :

Civil Action No.
07 Civ. 3214 (LBS) (HP)

NOTICE OF MOTION

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QUALITY KING FRAGRANCE, INC., :

Third Party Plaintiff, :

- against - :

J & H COSMETICS LTD., :

Third Party Defendant. :

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PLEASE TAKE NOTICE that, upon the accompanying Declaration of Ariane Mole dated January 24, 2008, and the exhibits attached thereto, the Declaration of Louis S. Ederer, Esq. dated January 25, 2008, and the Memorandum of Law in Support dated January 25, 2008, plaintiffs Yves Saint Laurent Parfums S.A. and YSL Beauté Inc., by its undersigned counsel, will move this Court on the 15th day of February, 2008, or as soon thereafter as the parties may be heard, before the Honorable Henry Pitman at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 18A, New York, New York 10007, for an order granting plaintiffs a protective order (i) forbidding defendant Costco Wholesale Corporation


("Costco") from having discovery of YSL Parfums' France-based computer servers by way of electronic term searches, and having the resulting electronic data transferred and produced to Costco in the United States, and/or (ii) prescribing that Costco pursue alternative discovery procedures which will permit YSL Parfums to comply with such discovery requests without exposing itself to criminal liability under French law, and (iii) awarding such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that answering papers, if any, are due on or before February 8, 2008.

Dated: New York, New York
January 25, 2008

Respectfully submitted,

ARNOLD & PORTER LLP

By: 
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